

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

COUNTRYMAN NEVADA, LLC,)
Plaintiff,) Case No.: 14-cv-1380
v.) Judge Elaine E. Bucklo
DOES 1 – 42,) Magistrate Judge Maria Valdez
Defendants.)

**PLAINTIFF'S NOTICE OF MOTION FOR LEAVE TO TAKE DISCOVERY
PRIOR TO RULE 26(f) CONFERENCE**

PLEASE TAKE NOTICE that on Thursday, March 20, 2014, at 9:30 am, or as soon thereafter as counsel may be heard, we shall appear before the Honorable Elaine E. Bucklo, in the courtroom usually occupied by her, Room 1441, in the United States District Courthouse at 219 South Dearborn Street, Chicago, IL and present the accompanying Motion for Leave to Take Discovery Prior to Rule 26(f) Conference.

Dated: March 14, 2014

Respectfully submitted,

COUNTRYMAN NEVADA, LLC

By: s/ Michael A. Hierl
Michael A. Hierl (Bar No. 3128021)
Todd S. Parkhurst (Bar No. 2145456)
Hughes Socol Piers Resnick & Dym, Ltd.
Three First National Plaza
70 W. Madison Street, Suite 4000
Chicago, Illinois 60602
(312) 580-0100 Telephone
(312) 580-1994 Facsimile
Attorneys for Plaintiff
Countryman Nevada, LLC

CERTIFICATE OF SERVICE

The undersigned attorney hereby certifies that a true and correct copy of the foregoing Notice of Motion was filed electronically with the Clerk of the Court and served on all counsel of record and interested parties via the CM/ECF system on March 14, 2014.

s/Michael A. Hierl